

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

MARIA ALEJANDRA CELIMEN SAVINO,
JULIO CESAR MEDEIROS NEVES, and all
those similarly situated,

Petitioners-Plaintiffs,

v.

STEVEN J. SOUZA,

Respondent-Defendant.

Case No. 1:20-cv-10617 WGY

BRIEFING ON INDIVIDUAL APPLICATIONS FOR BAIL
FRIDAY, APRIL 17, 2020

1. Guerra Nolasco, Marco
2. Darocha, Edlander
3. Armijos, Segundo
4. Mateo Mateo, Melvin
5. Miranda-Tapia, German Oliverio
6. Taylor, Rayon
7. Lux-Quinilla, Carlos
8. Gonzalez Victorio, Abelardo
9. Doe, Isaac
10. Jijon Mora, Felix

INTRODUCTION

Plaintiffs respectfully submit this briefing on the individual applications for bail that are scheduled for the Court's consideration on April 17, 2020. Information that is common to a number of applications (*e.g.*, briefing on CDC high-risk medical conditions) has previously been filed with this Court, *see* ECF 52, 56, 65, 74, 78, 81, and is incorporated herein by reference. The individualized briefings that are attached hereto as Exhibits 1-4, 6, and 8-9 refer to this information as it may be relevant to particular individuals, and also include the following information for each individual: a) Biographical Information; b) Medical Condition; c) Plans For Transportation/Lodging If Released; d) Criminal History; and e) Immigration History.¹

Plaintiffs have omitted substantive briefing on German Oliverio Miranda-Tapia (#5), as Plaintiffs have been unable to reach him to discuss this matter. Should Plaintiffs successfully contact Mr. Miranda-Tapia in the future, we will respectfully request that the Court consider his application at that time. Plaintiffs have also omitted substantive briefing on Carlos Lux-Quinilla (#7) and Felix Jijon Mora (#10), as Defendant has stated that both of these individuals have been released from custody on bond.

COMMON ISSUES IN INDIVIDUALIZED BRIEFINGS

I. The COVID-19 Pandemic Continues to Escalate in Massachusetts.

COVID-19 Deaths (MA)	COVID-19 Cases (MA) ²
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March 27, 2020 (Date of Complaint Filing)	35	3240
April 16, 2020	1,245 (increase of 137 in last 24 hours)	32,181 (increase of 2,263 in last 24 hours)

¹ As with previous filings, if the Court determines that there are certain records or additional evidence that is needed, or wishes the included material to be presented in a different format, Plaintiffs respectfully request that the Court so inform counsel, so that we may attempt to provide it to the Court expeditiously.

² Source: <https://www.mass.gov/info-details/covid-19-cases-quarantine-and-monitoring>.

CONCLUSION

Plaintiffs submit that for the foregoing reasons, as well as the specific reasons laid out in the attached individualized briefings, this Court should grant the release of Marco Guerra Nolasco, Edlander Darocha, Segundo Armijos, Melvin Mateo Mateo, Rayon Taylor, Abelardo Gonzalez Victorio, and Isaac Doe.

April 17, 2020

Respectfully Submitted,

/s/ Oren Sellstrom

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CERTIFICATE OF SERVICE

I hereby certify that, on April 17, 2020 a copy of the foregoing document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of this court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.

Date: April 17, 2020

/s/ Oren Sellstrom
Oren Sellstrom (BBO #569045)